

Schedule and Protocol For the Hearing of Royal Trust’s Motion on the Distribution of Funds in the HBC Main RCA and HBC Additional RCA (“the Motion”) on September 25, 2026

Further to the Court’s Direction, the following is the Schedule and Protocol with respect to the hearing of the Motion on September 25, 2026.

Note: This Schedule and Protocol shall be served on the Service List by July 20, 2026, and shall be posted on the Monitor’s Website and the ERC Webpage.

Note: ERC refers to Employee Representative Counsel

RT refers to Royal Trust Corporation of Canada, which is the Trustee of the HBC Main RCA and HBC Additional RCA

HBC refers to the Applicants herein

CCAA refers to the Companies’ Creditors Arrangement Act

Factum refers to formal written legal arguments

The original Motion Record can be found here: [Microsoft Word - Royal Trust - Notice of Motion re Advice and Directions on HBC RCAs](#)

The ERC Affidavit, Factum, Reply Factum if any, and Proposed Order in connection with the Motion will be served, filed and posted as hereinafter described in Sections 1, 2, 5 and 9.

The Protocol for an additional Interested Party to be designated as an Interested Party (as defined herein) in order to be able to file Affidavit evidence and/or a Factum is set out below in Sections 4 and 5.

The Schedule for those on the Service List and any additional Interested Parties (as defined herein) to serve and file additional Affidavit evidence and/or a Factum, is set out below in Sections 7 and 8.

The details of the ERC Information Session for members of the Plans associated with the HBC Main RCA and HBC Additional RCA are set out in Section 6.

The date for the Monitor’s Report in connection with the Motion is set out in Section 10.

The date of the hearing of the Motion is set out in Section 11.

1. Additional ERC and RT Affidavit Evidence

- On or before **July 17, 2026**, any additional affidavit evidence from ERC shall be served and filed, with the exception of the employment agreements relevant to HBC Additional RCA/ HBC Additional SERP.
- On or before **July 17, 2026**, ERC to file notice of motion, motion record, and factum in support of motion for an order authorizing ERC to file unredacted employment agreements under seal. Motion to be heard in writing.
- On or before **July 24, 2026**, RT may, if advised, serve and file a further affidavit addressing fees incurred to date.

2. ERC Factum and Proposed Order

- On or before **July 24, 2026**, ERC shall,
 - serve its Factum on the Service List,
 - provide its factum and this Schedule and Protocol to all SERP participants for whom it has email addresses, and
 - file its factum
- On or before **August 15, 2026**, ERC and HBC shall serve a proposed form of Order on the Service List. ERC shall also post the proposed Order on its website.

3. RT Factum

- On or before **July 31, 2026**, RT may file a factum that to address the Court's jurisdiction pursuant to the CCAA and *Trustee Act* to provide advice and direction.

4. Definition of Interested Parties

For the purposes of this Protocol, "Interested Party" means:

(a) any person who is not already on the Service List, whether in its own name or through counsel; and

(b) who have a defined interest in the subject matter of the motion, including, without limitation, members of the RCA and SERP groups and their estates.

5. Posting of Information for and Notice of Intention by Interested Parties

- On or before **July 27, 2026**, ERC shall post its factum on its webpage and on the Monitor's website, together with Information and Instructions on how Interested Parties may advise the Court of their intention to make submissions on the motion.
- The Information and Instructions shall include a Notice of Intention to be used by Interested Parties, as follows:
 - On or before **August 24, 2026**, any Interested Party intending to take a position on the motion shall deliver a Notice of Intention to both ERC and the Monitor.
 - The Notice of Intention shall be delivered by email and shall include:
 - the name and full contact information (address, email address and telephone number) of the Interested Party;
 - the name and full contact information of counsel for the Interested Party, if applicable;
 - a brief description of the Interested Party's interest in the motion; and
 - an acknowledgment that the Interested Party must serve and file any motion materials, including its record and factum, on or before **September 4 and 11, 2026**, respectively, failing which the Interested Party may not be heard at the hearing, subject to the discretion of the Court.
- Copies of any Notice of Intention or related correspondence received from Interested Parties shall be provided to RT by the Monitor.

6. ERC Information Session

- On or before **July 29, 2026**, ERC shall conduct a town hall by videoconference for members of the SERP and RCA groups to:
 - review RT's motion and the issues raised therein;
 - explain ERC's position;
 - review this Protocol and the process available to Interested Parties wishing to participate in the motion; and
 - answer questions from attendees.

7. Materials from Parties on the Service List

- On or before **August 7, 2026**, any party already on the Service List intending to participate in the motion shall serve and file its record and factum.

8. Materials from Interested Parties

- On or before **September 4, 2026**, any Interested Party intending to take a position on the motion shall serve and file its record.
- On or before **September 11, 2026**, any Interested Party intending to take a position on the motion shall serve and file its factum.

9. Reply Materials

- On or before **September 18, 2026**, ERC, and any other party that served materials in July 2026, may serve and file any reply affidavit evidence.
- On or before **September 18, 2026**, RT may serve and file any reply affidavit evidence and reply factum.

10. Monitor's Report

- On or before **September 18, 2026**, the Monitor may file any report relating to the motion.

11. Hearing

- The motion shall be heard on **September 25, 2026**.